

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BRIELLE J. PLAIR, as Personal
Representative of the **ESTATE OF**
KALIEB L. SOLOMON, Deceased,

Case No. 2:21-cv-12275
Hon. Arthur J. Tarnow

Plaintiff,

v.

COUNTY OF MACOMB, a political
subdivision of the State of Michigan;
RYAN STEMPNIEWSKI; and,
TIMOTHY RICKERT; Jointly
and Severally,

Defendants.

**PLAINTIFF'S REPLY TO DEFENDANTS'
SPECIAL AND/OR AFFIRMATIVE DEFENSES**

NOW COMES Plaintiff, BRIELLE J. PLAIR, as Personal Representative of the Estate of KALIEB L. SOLOMON, Deceased, by and through her attorneys, GARRISON LAW, PC, TREVOR B. GARRISON, and ANLYN ADDIS, and responds to Defendants' Special and/or Affirmative Defenses as follows:

1. In response to paragraph 1, denied for the reason that it is either untrue or inapplicable.
2. In response to paragraph 2, denied for the reason that it is untrue.
3. In response to paragraph 3, denied for the reason that it is untrue.

4. In response to paragraph 4, denied for the reason that it is untrue.
5. In response to paragraph 5, denied for the reason that it is untrue.
6. In response to paragraph 6, denied for the reason that it is either untrue or inapplicable.
7. In response to paragraph 7, denied for the reason that it is either untrue or inapplicable.
8. In response to paragraph 8, denied for the reason that it is untrue.
9. In response to paragraph 9, denied for the reason that it is untrue.
10. In response to paragraph 10, denied for the reason that it is either untrue or inapplicable.
11. In response to paragraph 11, denied for the reason that it is untrue.
12. In response to paragraph 12, denied for the reason that it is either untrue or inapplicable.
13. In response to paragraph 13, denied for the reason that it is either untrue or inapplicable.
14. In response to paragraph 14, denied for the reason that it is untrue.
15. In response to paragraph 15, denied for the reason that it is untrue.
16. In response to paragraph 16, this paragraph consists of assertions of law rather than allegations of fact, and therefore requires no response.

17. In response to paragraph 17, this paragraph consists of assertions of law rather than allegations of fact, and therefore requires no response.

18. In response to paragraph 18, denied for the reason that it is untrue.

19. In response to paragraph 19, denied for the reason that it is either untrue or inapplicable.

20. In response to paragraph 20, denied for the reason that it is untrue.

21. In response to paragraph 21, denied for the reason that it is untrue.

22. In response to paragraph 22, denied for the reason that it is untrue.

23. Denied, since the Defendants do not have an automatic right to amend their Affirmative Defenses.

Respectfully submitted,

GARRISON LAW, PC

Dated: December 14, 2021

/s/ Trevor B. Garrison

TREVOR B. GARRISON (P69255)

ANLYN ADDIS (P76568)

Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I caused the foregoing Plaintiff's Reply to Defendants' Special and/or Affirmative Defenses and this Certificate of Service to be electronically filed with the Clerk of the Court using the Case Management/Electronic Case Filing (CM/ECF) system which will forward notification of this filing electronically to the following attorneys of record:

John J. Gillooly, Esq. (jgillooly@garanlucow.com); and,

Kathleen M. Griffith, Esq. (kgriffith@garanlucow.com).

Respectfully submitted,

GARRISON LAW, PC

Dated: December 14, 2021

/s/ Trevor B. Garrison

TREVOR B. GARRISON (P69255)

ANLYN ADDIS (P76568)

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